

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOSHUA A. MONIGHAN	:	
	Plaintiff :	
	:	No. 1:18-CV-1654
v.	:	
	:	Judge Jones
TOM WOLF GOVERNOR	:	
COMMONWEALTH OF PA	:	Electronically Filed Document
	:	
	:	<i>Complaint Filed 08/21/18</i>
	:	
	Defendants :	

DEFENDANT WOLF’S MOTION TO DISMISS

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant Wolf, by and through his undersigned attorneys, hereby files this Motion to Dismiss the Complaint filed by the Plaintiff in the above-captioned action. In accordance with Local Rule 7.5, Defendant Wolf will file a Brief in Support of his Motion to Dismiss within fourteen (14) days of the filing of this Motion to Dismiss, setting forth the reasons supporting this Motion to Dismiss. A proposed Order has been filed herewith.

WHEREFORE, for the reasons set forth in Defendant Wolf’s forthcoming Brief in Support of his Motion to Dismiss, Defendant Wolf respectfully requests that this Honorable Court grant his Motion to Dismiss, and dismiss the Plaintiff’s Complaint, with prejudice.

Respectfully submitted,

JOSH SHAPIRO
Attorney General

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Date: September 11, 2018

By: s/ Keli M. Neary

KELI M. NEARY
Chief Deputy Attorney General
Civil Law Division, Litigation Section
Attorney ID 205178

Counsel for Defendant

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CERTIFICATE OF SERVICE

I, Keli M. Neary, Chief Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on September 11, 2018, I caused to be served a true and correct copy of the foregoing document titled Motion to Dismiss to the following:

VIA U.S. MAIL

Joshua A. Moniighan
6363 Basehore Road
Mechanicsburg, PA 17050
Pro Se

s/ Keli M. Neary
KELI M. NEARY
Chief Deputy Attorney General